

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

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4 Case No. 3:22-cv-00990-JD

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6 *IN RE WELLS FARGO MORTGAGE*  
7 *DISCRIMINATION LITIGATION*  
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5 **DECLARATION OF AMANDA M.**  
6 **WILLIAMS IN SUPPORT OF THE**  
7 ***PERKINS* PLAINTIFFS' RENEWED**  
8 **PROPOSAL TO APPOINT AMANDA M.**  
9 **WILLIAMS AND ABOU B. AMARA, JR.**  
10 **OF GUSTAFSON GLEUK AS INTERIM**  
11 **LEAD COUNSEL FOR THE PUTATIVE**  
12 **PLAINTIFF CLASS**

13 **DECLARATION OF AMANDA M. WILLIAMS**

14 I, Amanda M. Williams, declare and state as follows:

15 1. I am an attorney at law, duly admitted *Pro Hac Vice* to practice before this Court.  
16 I am a member of Gustafson Gluek PLLC, ("Gustafson Gluek" or "Firm") and counsel of record  
17 for Plaintiffs Elretha Perkins and Laronica Johnson, on behalf of themselves and all others  
18 similarly situated in this matter. This declaration is submitted in support of the Plaintiffs' renewed  
19 proposal, requesting that this Court appoint Abou B. Amara, Jr., Esq. and I as interim lead counsel  
20 for the putative plaintiff class in this consolidated action. I have firsthand, personal knowledge of  
21 the facts set forth below and if called as a witness could competently testify thereto.  
22

23 **THIS COURT PERMITS PARTIES TO SUBMIT RENEWED BRIEFING ON**  
24 **APPOINTMENT OF INTERIM LEAD COUNSEL**

25 2. On June 10, 2022, Elretha Perkins and Laronica Johnson ("*Perkins* Plaintiffs"),  
26 through their counsel, filed a putative class action against Wells Fargo Bank, N.A. and Wells Fargo  
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28 Declaration of Amanda M. Williams In Support of the *Perkins* Plaintiffs' Renewed Proposal to Appoint Amanda M.  
Williams, Esq. and Abou B. Amara, Jr., Esq. of Gustafson Gluek PLLC as Interim Lead Counsel in *In Re Wells*  
*Fargo Mortgage Discrimination Litigation*.

Home Mortgage (“Wells Fargo Defendants”), Inc., alleging discriminatory practices in mortgage lending.

3. On January 18, 2023, this Court ordered consolidation of the *Perkins* action with five<sup>1</sup> other cases filed against the Wells Fargo Defendants. Master ECF No. 102. In the same order, this Court authorized the various plaintiffs’ parties to submit renewed interim lead counsel proposals.

**GUSTAFSON GLUEK HAS PERFORMED EXTENSIVE  
WORK ON THIS CASE TO DATE**

4. I, along with Mr. Amara, and my law firm, Gustafson Gluek have expended an immense amount of time, resources, and energy identifying and investigating the claims in this case.

5. Gustafson Gluek attorneys began investigating the Wells Fargo Defendants on a different, but related, matter in 2021.

6. Since this investigation focused on the claims raised by the Perkins Plaintiffs, Gustafson Gluek’s investigation has included direct conversations with over 100 potential plaintiffs residing in 13 separate U.S. states. These states include Alabama, Arkansas, California, Georgia, Illinois, Louisiana, Minnesota, New Jersey, New York, North Carolina, Texas, Virginia, and Wisconsin.

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<sup>1</sup> *Williams v. Wells Fargo Bank, N.A.*, No. 3:22-cv-0090-JD (“*Williams*”); *Braxton v. Wells Fargo Bank, N.A.*, No. 3:22-cv-01748-JD (“*Braxton*”); *Pope v. Wells Fargo Bank, N.A.*, No. 3:22-cv-01793-JD (“*Pope*”); *Thomas v. Wells Fargo Bank, N.A.*, No. 3:22-cv-01931-JD (“*Thomas*”); and *Ebo v. Wells Fargo Bank, N.A.*, No. 3:22-cv-02535-JD (“*Ebo*”).

Declaration of Amanda M. Williams In Support of the *Perkins* Plaintiffs’ Renewed Proposal to Appoint Amanda M. Williams, Esq. and Abou B. Amara, Jr., Esq. of Gustafson Gluek PLLC as Interim Lead Counsel in *In Re Wells Fargo Mortgage Discrimination Litigation*.

7. As a result, Gustafson Gluek already possesses several documents that provide key insights and an understanding of how the Wells Fargo Defendants correspond with home loan seekers.

8. Gustafson Gluek has also consulted with six expert organizations in housing policy, housing finance, and social justice advocacy. These consultations have assisted the Firm in identifying several published reports and research in housing finance that will inform the creation of any subsequent complaints, discovery requests, and establishing facts prior to class certification.

9. These reports include: (i) 2022 Fair Housing Trends Report, National Fair Housing Alliance; (ii) Consumer-Lending Discrimination in the FinTech Era, November 2019, Robert Bartlett, Adair Morse, Richard Stanton, and Nancy Wallace, University of California at Berkley, Published by the Journal of Financial Economics; (iii) “Data Point: 2020 Mortgage Market Activity and Trends,” Office of Research Publication, Consumer Financial Protection Bureau (2021); (iv) The Attorney General’s 2020 Annual Report to Congress Pursuant to the Equal Credit Opportunity Act, Amendments of 1976, U.S. Department of Justice (Sept. 2021); and (v) Our America: The Equity Report, ABC News.

10. As of February 1, 2023, Mr. Amara and I have invested hundreds of hours into this case.

**THE PERKINS PLAINTIFFS’ COUNSEL ARE EMINENTLY QUALIFIED TO SERVE  
AS INTERIM COUNSEL**

11. The Perkins Plaintiffs legal team are highly qualified to serve as interim counsel for the full putative class of plaintiffs.

Declaration of Amanda M. Williams In Support of the *Perkins* Plaintiffs’ Renewed Proposal to Appoint Amanda M. Williams, Esq. and Abou B. Amara, Jr., Esq. of Gustafson Gluek PLLC as Interim Lead Counsel in *In Re Wells Fargo Mortgage Discrimination Litigation*.

12. Over the last two decades, Gustafson Gluek has been appointed as lead class counsel and to related leadership positions in numerous complex class action cases across the country and has recovered billions of dollars on behalf of a myriad of injured class members.

13. Founded in 2003, Gustafson Gluek is a national class action firm, with offices in California and Minnesota. Gustafson Gluek's attorneys consistently are recognized by their clients, peers, and courts across the country as leaders in their field and, as such, have been chosen to lead some of the largest and most complex multi-district litigations. A copy of Gustafson Gluek PLLC's Firm Resume, including a list of cases the Firm has served in leadership roles, is attached as Exhibit A.

14. For this matter, I, Amanda Williams, will lead Gustafson Gluek's efforts. I joined the Firm in 2005 and have been actively litigating antitrust, civil rights, consumer protection, and product liability class actions ever since. I have played an active role as plaintiffs' counsel in the following cases:

- *In re Medtronic, Inc., Implantable Defibrillators Prod. Liab. Litig.* (D. Minn.)
- *In re Syngenta Litig.* (Minn.)
- *In re Asacol Antitrust Litig.* (D. Mass.)
- *Ciofoletti et al. v. Securian Financial Group, Inc.* (D. Minn.)
- *Reed, et al. v. Advocate Health Care, et al.* (N.D. Ill.)
- *Graves v. 3M Company Earplugs Litig.* (Minn.)
- *In re Medtronic Inc. Sprint Fidelis Leads Prod. Liab. Litig.* (D. Minn.)
- *Karsjens et al v. Jesson* (D. Minn.)

Declaration of Amanda M. Williams In Support of the *Perkins* Plaintiffs' Renewed Proposal to Appoint Amanda M. Williams, Esq. and Abou B. Amara, Jr., Esq. of Gustafson Gluek PLLC as Interim Lead Counsel in *In Re Wells Fargo Mortgage Discrimination Litigation*.

- *St. Jude (Pinsonneault v. St. Jude Medical, Inc., et al. (D. Minn.); Houlette v. St. Jude Medical Inc., et al. (D. Minn.); Rouse v. St. Jude Medical, Inc., et al. (D. Minn.))*
- *Jessica Robinson v. Jackson Hewitt, Inc., et al. (E.D. Va.)*
- *American Home Realty Network (Regional Multiple Listing Service of Minnesota, Inc., d/b/a NorthstarMLS v. American Home Realty Network, Inc., (D. Minn.))*;
- *Metropolitan Regional Information Systems, Inc., v. American Home Realty Network, Inc. (D. Md.)*
- *Preferred Carolinas Realty, Inc., v. American Home Realty Network, Inc., d/b/a Neighborcity.com (M.D.N.C.)*

15. I have been recently appointed to leadership roles in *In re 3M Combat Arms Litig.* (Henn. Cty. Minn.) and the *In re American Medical System, Inc., Litig.* (Henn. Cty. Minn.), and was named to the trial team in the *In re Syngenta Litig.* (Henn. Cty. Minn.).

16. I currently serve on the Board of the Infinity Project, an organization whose mission is to increase the gender diversity of Minnesota's state and federal benches. In 2017 and 2022, I was named an "Attorney of the Year" by the Minnesota Lawyer publication and has been continuously recognized as a "Super Lawyer."

17. Abou Amara joins me on the prosecution team. Mr. Amara is a plaintiffs' class action litigator with experience in antitrust, civil rights, consumer protection, and products liability. Currently, Mr. Amara is active counsel in:

- *In Re Beef Antitrust Litig.* (D. Minn.)
- *In Re Broiler Chicken Antitrust Litig.* (N.D. Ill.)
- *In Re Pork Antitrust Litig.* (D. Minn.)
- *Roamingwood Sewer v. National Diversified Sales* (M.D. Pa.)

Declaration of Amanda M. Williams In Support of the *Perkins* Plaintiffs' Renewed Proposal to Appoint Amanda M. Williams, Esq. and Abou B. Amara, Jr., Esq. of Gustafson Gluck PLLC as Interim Lead Counsel in *In Re Wells Fargo Mortgage Discrimination Litigation*.

1           18. Prior to joining Gustafson Gluek, Mr. Amara was a civil rights and employment  
2 attorney at a Minneapolis law firm and served as a judicial law clerk on the Minnesota Supreme  
3 Court.

4           19. In addition, Mr. Amara's experience in housing extends beyond the practice of law.  
5 For nearly a decade before entering private practice, Mr. Amara worked on housing policy, among  
6 other issues, before Congress and in the Minnesota State Legislature.

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8           20. Mr. Amara was named a "Rising Star" by Super Lawyers for his class action  
9 litigation practice and an "Up and Coming Attorney" by the Minnesota Lawyer publication. He  
10 was also named the 2021-2022 Outstanding New Lawyer of the Year by the Minnesota State Bar  
11 Association. Mr. Amara is presently the Vice President of the Minnesota Association of Black  
12 Lawyers, is an active member of the American Bar Association's "Black Squad" Antitrust Group,  
13 and serves on a host committee of the National Bar Association, the national association active on  
14 behalf of African American lawyers.

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16           21. Ms. Williams and Mr. Amara will be assisted by longtime California attorney,  
17 Gustafson Gluek's Dennis Stewart. Mr. Stewart has worked for over 30 years almost exclusively  
18 representing plaintiff classes in complex litigation, including as a partner at Hulett Harper  
19 Stewart's San Diego, California office and as a trial attorney with the Justice Department. Mr.  
20 Stewart's experience with the banking industry includes serving as lead counsel, principal counsel  
21 and/or trial counsel in class action litigation against, among others, Wells Fargo, in cases involving  
22 interchange fees and currency conversion fees. Mr. Stewart has tried class action cases and  
23 representative actions against the NCAA, Visa and Mastercard, Johnson and Johnson, and others.

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**GUSTAFSON GLUEK HAS INVESTED SIGNIFICANT RESOURCES TO THIS ACTION AND IS COMMITTED TO CONTINUING TO DO SO**

22. Gustafson Gluek has offices in California and Minnesota and dedicates its entire practice to precisely this type of litigation: complex plaintiffs' class action litigation.

23. Gustafson Gluek has already committed itself to this case and has teamed up with two other law firms, Teske Katz PLLP of Minneapolis, Minnesota, and the Scott Hirsch Law Group of Coconut Creek, Florida, to add any needed capacity.

24. Gustafson Gluek has a well-earned reputation for being able to work well with other counsel. In the Firm's experience leading other complex litigation, drawing from diverse points of view and experience is invaluable and, as such, Gustafson Gluek is willing to work with other firms that have filed these cases. There is a strong pool of resources available to the plaintiffs and potential class members but there needs to be strong leadership at the top to know how to utilize all of these resources effectively and efficiently. Gustafson Gluek possesses the knowledge, resources, and commitment to do just that and to lead this case through to conclusion for all the plaintiffs impacted by the Bank's conduct.

**GUSTAFSON GLUEK IS COMMITTED TO IMPLEMENT EXTENSIVE PROTOCOLS TO ENSURE COSTS AND FEES ARE NOT EXCESSIVE**

25. Gustafson Gluek's commitment to providing the resources necessary to effectively prosecute this action is equally matched by the Firm's commitment to judiciously be accountable for a detailed accounting of time, attorney staffing, hotel, and travel accommodations. As the Firm has done in several cases before, Gustafson Gluek will implement extensive protocols to ensure costs and fees are not excessive and are contemporaneously recorded and reviewed.

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1 By: /s/Amanda M. Williams  
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11 **and Laronica Johnson.**  
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